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S. C. PUBLIC SERVICE COMMISSION
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STATE OF SOUTH CAROLINA
BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

APPLICATION OF)
THE OTHER PHONE COMPANY, INC.)
D/B/A ACCESS ONE COMMUNICATIONS)
FOR A CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY TO PROVIDE LOCAL EXCHANGE)
AND RESOLD LONG DISTANCE)
TELECOMMUNICATIONS SERVICES)

DOCKET NO. 98-443-C

Prefiled Testimony

of

Kevin D. Griffo

The Other Phone Company, Inc.

d/b/a Access One Communications

S. C. PUBLIC SERVICE COMMISSION
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UTILITIES DEPARTMENT

RETURN DATE: _____
SERVICE: OK MR

Q. Will you please state your name and business address for the record.

A. My name is Kevin D. Griffo. My business address is 4205 Vineland Road, Suite L-15, Orlando, Florida 32811. My telephone number is (407) 648-5230 and facsimile number is (407) 648-5240.

Q. By whom are you employed and in what capacity?

A. I am the President and COO of The Other Phone Company, Inc., doing business as Access One Communications.

Q. Please give a brief description of your background and experience.

A. Prior to joining Access One Communications, I held a number of executive positions at AMNEX, Inc., including Corporate COO and President of AMNEX's Telecommunications Division. Under my direction, this Telecommunications Division grew to over \$100 million in revenues.

In addition to this experience, I also served as the Regional Vice President for LDDS WORLDCOM.

Q. Are you familiar with the Application submitted by Access One Communications to this Commission?

A. Yes, the Application in this proceeding was prepared under my supervision and direction.

Q. What is the purpose of your testimony?

A. This testimony has been filed to answer the question for this Commission as to whether Access One Communications is technically, financially, and managerially fit to provide the services it proposes in South Carolina.

1 **Q. Describe your company.**

2
3 A. Access One Communications is a Florida corporation. A copy of our authorization to
4 conduct business in South Carolina is attached to our application in Exhibit I.
5

6 **Q. Please describe Access One Communications's proposed operations in South Carolina.**
7

8 A. Access One Communications proposes to offer resold local service bundled with toll,
9 internet and voice messaging applications throughout the state of South Carolina. Our
10 service is tailored for business customers.
11

12 **Q. Will Access One Communications offer interLATA long distance service?**
13

14 A. Yes, or customers may presubscribe to an alternative long distance carrier.
15

16 **Q. Does Access One Communications own any network switches or transmission facilities**
17 **used in routing calls?**
18

19 A. No, Access One Communications will not be building its own facilities, but intends to
20 resell the retail services of the ILEC. In addition, Access One Communications envisions
21 purchasing services or facilities from other facility based CLECs in the future.
22

23 **Q. How will Access One Communications bill for its services?**
24

25 A. Access One Communications intends to bill its customers directly, using its in-house
26 billing systems. Our name will appear on the bill and the bill will contain our toll free
27 number for inquiries.
28

29 **Q. How are trouble reports, billing errors and complaints handled?**
30

31 A. Complaints may be reported by the customer via Access One Communications's toll free
32 customer service number, which is 1-800-547-7101. This or a comparable number will

1 appear on the customer's bill and customers may contact this number for information
2 concerning their bills. Customer service agents will be available twenty-four hours per
3 day, seven days a week. Access One Communications will be responsible for all customer
4 inquiries and complaints and the toll free telephone number will be provided on the
5 customer bill and in all Access One Communications mailings.

6
7 Alternatively, customers wishing to communicate with an Access One Communications
8 customer service representative in writing may send written correspondence to our
9 corporation at:

10
11 The Other Phone Company, Inc.,
12 d/b/a Access One Communications, ATTN: Vicky Santiago
13 4205 Vineland Road
14 Suite L-15.
15 Orlando, FL 32811
16

17 For the most part, Access One Communications will interface with the ILEC for line
18 maintenance because it will not have its own outside plant facilities.
19

20 **Q. Was Access One Communications's illustrative tariff prepared under your**
21 **supervision?**

22
23 **A. Yes, it was.**
24

25 **Q. Describe the services offered in your tariff.**
26

27 **A. Access One Communications has yet to prepare a final tariff for service in South Carolina**
28 **until negotiations are completed with BellSouth. A proposed tariff is provided for the**
29 **Commission's consideration as Exhibit D to this testimony. We intend to offer several**
30 **service options at rates competitive with those of the ILECs.**
31

32 **Q. Does Access One Communications have the technical and financial ability to offer**

1 the proposed services?

2
3 A. Access One Communications has sufficient financial capability to provide the requested
4 telecommunication services in South Carolina, the financial capability to maintain these
5 services, and the financial capability to meet its lease and ownership obligations.

6
7 Access One Communications has been providing quality telecommunications services to
8 over 6000 customers throughout the State of Florida since 1996. The Company has a
9 proven track record for providing high quality services and responsive customer service.
10 Access One communications possesses all the necessary capabilities to operate as a
11 provider of resold services and unbundles elements.

12
13 Access One Communications has incurred the normal start-up costs of entering the local
14 exchange telecommunications market. As with most ventures, Access One
15 Communications expects profitability to be achieved within 12-18 months upon entering
16 a new market. Access One Communications has the financial strength to absorb start-up
17 losses.

18
19 The Company has established a strong team to support its venture into the
20 telecommunications market. Access One Communications has managerial ability with a
21 wealth of knowledge and day to day experience in the telecommunications industry that
22 will allow it to be a successful competitive local exchange and toll provider.

23
24 The Company has and will outsource business functions to obtain expertise and provide
25 a financial and technical competitive advantage in the industry.

26
27 Q. How do you plan to solicit customers?

28
29 A. Access One Communications will use a variety of techniques to obtain customers.
30 Primarily, customers will be approached using personal visits or telephone calls (a
31 telemarketing script is attached to this testimony). Other business customers will need to
32 be reached using alternative contact methods, e.g., direct mailing or more wide ranging

1 coverage in newspapers, magazines, etc. The precise plans have not yet been developed
2 but entry into a highly competitive market will require a significant effort to acquire
3 customers.
4

5 **Q. Have any formal complaints or judgments been levied against the company?**

6
7 A. No. Access One Communications has not been involved in any formal proceedings or had
8 any judgments levied against the company.
9

10 **Q. Has the Company ever been investigated or sanctioned by any regulatory authority**
11 **for service or billing irregularities?**
12

13 A. No, Access One Communications has never been investigated or sanctioned for service
14 or billing irregularities.
15

16 **Q. Has the Company's certification ever been revoked or denied in any jurisdiction?**
17

18 A. No. Access One Communications has never had certification denied or revoked.
19

20 **Q. Why is Access One Communications seeking exemptions from USOA, directory**
21 **publishing and certain reporting requirements?**
22

23 A. Access One Communications plans only to be a pure reseller of bundled services. As
24 such, it will not publish a directory directly, but will arrange for its customers to be
25 published in the LEC directory. This is more efficient for Access One Communications
26 and gives the customer a better service. Also, as a reseller, Access One Communications
27 will not construct facilities or have direct control over physical facilities, therefore Access
28 One Communications seeks exemption from any report that would not be applicable to a
29 resale local provider. Finally, Access One Communications keeps its books and records
30 on a nationwide basis according to GAAP.
31

32 The company currently maintains its books and records according to GAAP (Generally

1 Accepted Accounting Principles). Access One Communications requests the waiver to
2 avoid maintaining two sets of books. USOA was designed for an older form of rate base
3 regulation that has little value in a telecommunications environment. Through GAAP
4 accounting methodology, the Commission will be able to obtain any information necessary
5 to evaluate Access One Communications's performance without imposing any unnecessary
6 accounting burdens on the company.

7
8 **Q. Where in South Carolina does Access One Communications intend to offer its services**
9 **and how will those services be offered?**

10
11 **A.** Access One Communications intends to offer service throughout the state, primarily to
12 business customers. All marketing is handled by our in-house staff of marketing experts.
13

14
15 **Q. Has Access One Communications begun negotiations with incumbent LECs in South**
16 **Carolina?**

17
18 **A.** Yes, Access One Communications has a regional agreement with BellSouth and GTE.
19 The company is in the process of negotiating with these carriers specifically for South
20 Carolina.
21

22 **Q. How will South Carolina consumers benefit from services provided by Access One**
23 **Communications?**

24
25 **A.** Certification of Access One Communications will increase the level of local competition
26 in South Carolina.
27

28 **Q. Does this conclude your testimony?**

29
30 **A.** Yes.

THE OTHER PHONE COMPANY, INC.
D/B/A
ACCESS ONE COMMUNICATIONS

EXHIBIT I

TELEMARKETING SCRIPT

AUG-21-98 11:16

FROM-

T-167 P.01/01 F-066

NEW Sales Script - Ken

Hello _____ this is _____ from Access One Communications calling about your local telephone service. Mr./Mrs. _____ are you aware that because of the deregulation of the telephone industry you can now receive up to a 10% discount on your local telephone service?

_____ I can show you a way that you will keep your present phone numbers, fax #'s etc... and you can get a 9.9% discount ^{BN} every BellSouth charge. No monthly minimum charges. No fine print and No Gimmicks.

_____ you might ask how are we able to do this??? I'm calling from a company called Access One Communications. We are *A* licensed authorized reseller of BellSouth Communication services in the 9 state BellSouth territory. We have activated over 20,000 access lines. As an example, how many lines do you have? _____ Of course we get better rates than you do because of our size. All we do is pass on the savings to you while you are still able to use the BellSouth network for the same reliable service you're accustomed too.

_____ so what I'm saying to you, Mr./Mrs. _____, you get to keep your phone number, keep the same reliable network, it will not cost you a dime to switch, and we can give a 9.9% discount on every BellSouth charge. Let me ask you, is there any reason you would not want to do that???

_____ How many lines do you have at this location? _____ Are there any questions I can answer for you??? _____ We also offer a long distance rate of 9.9 cents per minute, NO MONTHLY MINIMUMS like SPRINT & AT&T, 6 second increments and finally you will get the convenience of local and long distance on one bill. Do you have an interest in receiving a break on your long distance rate also??? To begin receiving your discounts I need you to hold for my verification department to verify that you want to switch to Access One as your local service provider.

Please hold....

THE OTHER PHONE COMPANY, INC.
D/B/A
ACCESS ONE COMMUNICATIONS

EXHIBIT II

THIRD PARTY VERIFICATION SCRIPT

(C)

Computer Verification for AOC (Access One Communications)***Press: Conference / Transfer - Speed Dial - 690.*****Enter room & Rep ID Number: _____ (A total of 8 digits) Press the # Sign.****Please enter your customer's Area Code and Main Billing Telephone Number and then Press the # Sign.****The system will repeat the number and ask the TRS to press (1) if this is correct. Then the system will tell the TSR to conference in the customer.*****Press: #1 - then conference / Transfer (you must do this very quickly).*****ANY INTERRUPTION AFTER THIS POINT BY THE TSR WILL BE CAUSE FOR A REJECTED ORDER AND THE PROCESS WILL HAVE TO BE REPEATED.****Thank you for choosing Access One as your new telecommunications service provider. This is a fully automated voice verification system. Federal regulations require that we record this call. You will be asked seven questions.**

- 1) After the tone please state the name of your company.**
- 2) After the tone please state your area code and main billing telephone number.**
- 3) If you are the Authorized person regarding your companies phone service and agree to switch your local or local & long distance service to Access One after the tone please say
YES LOCAL ONLY or YES LOCAL & LONG DISTANCE .**
- 4) You understand that Access One is a separate company from your current local phone company and Access One will become your new telecommunications service provider while providing you with a ^{9.9}5% discount on all your local line charges & related features along with your 9.9 cents per minute for long distance calls. To Authorize, after the tone please say YES.**
- 5) After the tone please state total number of phone lines, include the main number in your total.**
- 6) After the tone please state your First and Last Name and your title.**
- 7) For security purposes, after the tone please state your Mothers Maiden Name.**

Your new special service toll free number is 1-800-547-7101.

THE OTHER PHONE COMPANY, INC.
D/B/A
ACCESS ONE COMMUNICATIONS

EXHIBIT III

ACCESS ONE COMMUNICATIONS
VERIFICATION/WELCOME SCRIPT

③

Hello ----- My name is -----. I'm calling to welcome you To Access One Communication, and thank you for switching your local Phone service.

You will be receiving an Access One welcome package, within a week, and your savings will begin within a few days.

Should you have any questions, Please feel free to call us at our toll free number, the number is 1-800-547-7101 our business hours are Mon - Fri from 8am to 8pm.

I have a couple of points I'd like to review with you concerning your switch to access one.

1. Although everything remains "as is" with the BellSouth Network you will be receiving a disconnect notice from them. I can assure you that you are never actually disconnected from the BellSouth Network. This is there way of telling you that you are now an Access One customer.
2. Secondly you may receive a first bill from Access One that appears to be higher then what you are use to with BellSouth. The reason for this is all utilities such as cable TV and local Telephone Company's bill forward rather them backwards. So your first bill with us will be for a pro rated amount.
3. An example of this would be if you switch to Access One on the 15th of the month and Access One billed you on the 1st of the month, you would be billed from the 15th to the 1st plus the 1st to the 30th of the next month. This is also how BellSouth is currently billing you.
4. Along with receiving a disconnected notice from BellSouth they will also be sending you a refund check for the amount you pre-paid on their service but never used.

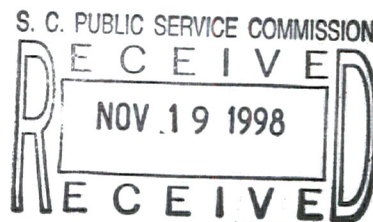
Do you have any questions on any of these points?

By the way were you aware that Access One offers long distance service at a flat rate of 9.9 cent per min anywhere in the United States and it's conveniently billed on the same invoice as your local service?

Once again we like to thank you for choosing Access One Communication and have a great day.

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 98-443-C



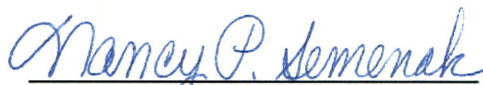
IN RE: Application of)
The Other Phone Company, Inc.)
d/b/a Access One Communications)
for a Certificate of Public Convenience)
and Necessity To Provide Local Exchange)
and Resold Long Distance)
Telecommunications Services)

CERTIFICATE OF SERVICE BY MAIL

This is to certify that I, Nancy P. Semenak, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the prefiled testimony of Mr. Kevin D. Griffo in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Margaret M. Fox, Esquire
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29201

Dated at Columbia, South Carolina this 19th day of November, 1998.


Nancy P. Semenak